

Commissioners;

Please do not delay further the implementation of Wireless Number Portability (WNP). However, please further specify that numbers which are ported, including from wired to wireless, need to be assured of the option to retain their phone listing in the Directory Service system, as cited in the Telecom Act of 1996, but which I have not seen implemented.

Having participated in the Wireline-Wireless Integration Task Force under the NANC for WNP, a clear need was recognized for consumers and enterprises to be able to change their phone service without changing their phone listing for competition to truly exist in any meaningful way. Also recognized was that this capability might well mean changing phone service from wired to wireless and perhaps vica-versa ("Inter-species" as we called it) so that this capability need to be included.

For businesses which would incur large sums to change all of their contact information, and likely would still lose customers relying on old data; and for consumers (and particularly parents of youngsters), who had memorized their contact information (i.e. do you recall your own parent's number), the requirement of changing of phone numbers was recognized as not a very viable alternative for competition to exist. (A review of the arguments for both sides of this discussion were detailed and documented by the WWITF, and presented to the NANC, so you don't need another review of them here.)

Most disheartening during the WWITF sessions, was that the RBOCs were clearly doing their best to stall any and all movement forward with this FCC mandate. The behavior of many of those who belonged to wireless operators, own by wired companies, was like night & day, when their wired counterparts were present. Who pulled the strings in each company (the wired folks) was very clear. SBC's wired representative reigned supreme, even among his peers, in this regard - continually arguing that it made no sense to move forward because no one had ever presented a business case to do any porting, nor had anyone anywhere ever shown any need to port from wired to wireless phone service anywhere. At one point, in a Kansas City meeting, I incurred his permanent wrath by specifically citing the experience of LNP abroad, and of three(3) individuals in the U.S. who would port their wired to wireless service if they could do so. In all three cases, however, they would need assurance that they could keep their phone listing as being available for the operators providing local Directory Assistance service, and in the phone book. One was a lender; one a consultant; one a real estate agent. Indeed, the consultant only kept (and still keeps) a wired phone number so he could be in directory assistance & the phonebook, and had his landline calls all forwarded to his mobile number for wherever he was currently engaged.

I would submit that the entire movement of wired to wireless service is happening due to the convenience of mobility, and that the lack of WNP has served as a barrier-to-enter for some individuals and firms to its convenience, and further delayed some of this movement. For those carriers whose principal ownership is by wired operators, they have clearly expressed that their positions regarding WNP are often dictated by the wired management. And, as you are well aware, the business case for wired phone service is not pretty (i.e. given maintenance & depreciation costs of copper lines), with or without WNP, so long as wireless is an option to the subscriber. It is clear that wired carriers are incented to stall any form of LNP due to

the risk of lossing their subscribers.

If they are concerned about the costs of Wireless Number Portability, have them void the need for Wireless Carriers to maintain their service based on historical rate plan centers and service areas.

In summary, please do not allow the major phone companies from keeping our nation's phone service from properly evolving. Require that full number portability be implemented this fall, and stipulate that those who do port must be allowed to maintain their numbers available for Directory Assistance operators to provide, and phone books to list, if the subscriber so desires.

I thank you for your attention; and, I would welcome any questions to the above.

John Glavin